87

State of New Mexico
ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
Telephone (505) 827-0187
Fax (505) 827-0160

GARY E. JOHNSON
GOVERNOR

PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

April 13, 2000

USDA-Forest Service
Content Analysis Enterprise Team
Attn: UFP
Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake City, Utah 84116

Subject: Comments on the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management

Dear Content Analysis Enterprise Team:

The New Mexico Environment Department Surface Water Quality Bureau (Bureau) takes this opportunity to provide comment on the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. The Bureau believes that the establishment of a framework for the watershed approach on Federal land and resource management activities is consistent with the State approach to watershed management.

Our primary concern for the Unified Federal Policy is the assessment of watershed function and condition. During the development of the New Mexico Unified Watershed Assessment (UWA) it became clear that the inability to share and compare data was a serious roadblock in watershed assessment and prioritization. Each agency, whether Federal or State, already uses different sets of tools for watershed assessment. An example of this inconsistency is the assessment of stream health. The Forest Service uses T-Walk, Bureau of Land Management uses Proper Functioning Condition, and the State uses the Rosgen approach. These approaches are not comparable in the level of detail or quality of data they provide. In order that data can be shared, it is necessary to coordinate assessment techniques to have comparable data and ensure that quality assurance/control requirements are met.

CAET RECEIVED
APR 14 2000

81

Attached to this letter are detailed comments on several specific aspects of the policy. Thank you for your consideration of these points.

Sincerely,

James H. Davis, Ph.D.
Bureau Chief

JHD:kmd

CAET RECEIVED
APR 14 2000

81

NEW MEXICO ENVIRONMENT DEPARTMENT
SURFACE WATER QUALITY BUREAU
COMMENTS ON:
The Unified Federal Policy for Ensuring a Watershed Approach
to Federal Land and Resource Management

Policy Goals

Statement:
Improve consistency among Federal programs: use a watershed approach to prevent and reduce water pollution resulting from Federal land and resource management activities and accomplish this in a unified and cost-effective manner.

Comment:
How are agencies going to establish working groups within the agencies to managing Federal lands to assess, protect, and restore watersheds? Each agency splits up their jurisdictional boundaries (regional offices) differently—how will this be dealt with?

Statement:
Identify specific watersheds in which to focus our budgetary and other resources.

Comment:
Is there a timeframe for this identification process? Will there be efforts to increase funding?

Agency Objectives

Statement:
The policy emphasizes assessing the function and conditions of watersheds.

Comment:
What standardized tools will be used to do this? Each agency uses different tools such as Rosgen's stream morphology/PFC/T-walk. Agencies may collect and analyze their samples differently i.e. the USGS collects depth integrated samples, while other agencies may take grab samples or use continuous recording data. As well, samples collected by various agencies may/may not reflect seasonal variability. Each agency already has a different methodology for assessing conditions and functions of watersheds. For example, the SWQB delineates watershed studies to be done based on a 1996 consent decree (between the US EPA and environmental groups) and an MOU between The New Mexico Environment Department and the US EPA. Therefore, the SWQB develops TMDLs on this timeline for watersheds agreed to in the consent decree. As well, different agencies delineate watersheds differently (some may use HUC codes or other methods).

CAET RECEIVED
APR 1 4 2006

87

Statement:
A framework for classifying the condition of watersheds with significant Federal lands and resources will be developed. The Federal Agencies will "provide the results of these assessment to States and Tribes."

Comment:
Will this framework be an established methodology used by all agencies? It would be more useful to include States and Tribes in the assessment process. This would provide for a consistent approach to watershed assessment across all lands within a State's boundaries.

Statement:
Federal agencies will conduct watershed assessments for watersheds that have significant Federal lands and resources.

Comment:
Does significant mean of a certain size? Cultural value? Recreational use? The determination of what makes lands significant needs to be clarified.

Statement:
The policy would monitor and restore watersheds.

Comment:
How will quality assurance/quality control issues be addressed or required for collecting/monitoring and restoring watersheds? The SWQB currently only uses SWQB data in water quality assessments, except where the SWQB has trained other agency personnel/public in our methodologies using our Quality Assurance Project Plan (QAPP). For TMDL assessments, the SWQB can only use data that meets our QA/QC requirements.

CAET RECEIVED
APR 14 2000